As a Horticulture professor and former parks manager I am concerned with the new recommendations to change the current Model Water Efficiency Ordinance. Specifically,

(M) The irrigation system must be designed and installed in such a manner that a precipitation rate of 1.0 inches per hour is not exceeded in any portion of the landscape.

This limits the products that we can use to irrigated and doesn't take into account proper management. If an irrigation manager is taking into account their soil type, slope and type of plant material to irrigate properly they will adjust run time to maximize the infiltration rate and prevent runoff. Cycle soak, multiple run times, soil sensors etc.

I am concerned that we are only looking at one aspect of this very complicated puzzle....design. Certainly irrigation audits are important and should be conducted. What about the management of the systems after install and the initial audit? Who will enforce efficient landscapes after install?

There should be an exclusion for agencies that use a central control system like Maxicom or equivalent. Flow sensing is vital to management of irrigation systems and in my opinion, vital to be able to detect waste (leaks, broken heads, etc). I did a search in the document for "flow sensing" and came up with nothing. There should be exclusions for agencies that are good stewards of the land and use irrigation water in an efficient manner already. Maybe we should have certified cites which would include certified staff.

I understand that this document is including residential and commercial and not all of my suggestions fit the residential landscape but common sense and science need to play the largest roles in these types of ordinances. Math is great and quantifying water and delivery systems is important but that is only one piece to the puzzle.

Respectfully,

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